

GILADI

1

2 Q. Have you seen Dr. Hernes since
3 Dr. Strauch's surgery?

4 A. Since Dr. Strauch's surgery?

5 Q. Yes

6 A. If I saw him 1994, that's since
7 Dr. Strauch's surgery.

8 Q. The last time you saw Dr. Hernes, did
9 he make any recommendations to you for treatment?

10 A. He was talking about having surgery on
11 my back, if I am not mistaken.

12 Q. Did you discuss your arms, your upper
13 extremities, with Dr. Hernes?

14 A. He -- I, I did not go to him for that,
15 but he saw the splint in my hand, he asked me a
16 question, I responded, he evaluated and he put it
17 in his report.

18 Q. I see today you are wearing a splint on
19 your left arm?

20 A. That's correct.

21 Q. Not on your right arm, is that correct?

22 A. That's correct.

23 Q. Did you have any discussions with
24 Dr. Hernes about the condition of your left arm?

25 A. Not in a lot of details.

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2 Q. What did Dr. Hernes say to you and what
3 did you say to him?

4 A. He saw --

5 MR. DINHOFFER: Note my objection to
6 hearsay, you can answer over objection.

7 A. (Continuing) he saw the scar. I do not
8 recall if he saw the scar or not. I do not
9 recall. I just -- he just saw that my hand is very
10 weak and I cannot function with my left hand.

11 Q. Well, did he undertake an examination
12 of your left arm?

13 A. He, I believe he did. I am not sure.
14 It was -- as I said, this is a long time ago and --
15 I real really do not have the full detail in my
16 mind at the moment.

17 Q. Is it safe to say that the details of
18 the medical care you were receiving at that time
19 are no longer fresh in your mind?

20 A. Yes.

21 Q. Did you see any other doctors at
22 Dr. Hernes' recommendation?

23 A. I believe, he did send me to somebody,
24 I do not recall, what was it.

25 Q. What specialty?

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2 A. I do not recall.

3 Q. Was it a doctor here or in Israel?

4 A. In Israel.

5 Q. Do you have any records at home with
6 respect to who that doctor may have been?

7 A. I do not know.

8 Q. When you are in Israel, who pays your
9 medical bills?

10 A. Who pays my medical bills?

11 Q. In Israel.

12 A. As I said before, I paid cash.

13 Q. Did you see a Dr. Helft?

14 A. What?

15 Q. H-E-L-F-T?

16 A. I may, I don't know, I cannot swear to
17 that.

18 Q. Do you have a recollection whatsoever
19 of seeing a Dr. Helft?

20 A. As I said I may have, I do not recall.

21 Q. What about Dr. Lester?

22 A. Dr. Lester, yes, I saw.

23 Q. What is Dr. Lester's specialty?

24 A. She's a hand surgeon.

25 Q. When did you see Dr. Lester?

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2 A. Many, many years back. I cannot even
3 tell you the date. I think the last time I saw her
4 maybe '93 or '94.

5 Q. As of the last time that you saw
6 Dr. Lester, had he or she made any recommendations
7 to you for care?

8 A. I do not recall the full conversation.

9 Q. Have you had any discussions with, in
10 the last five years, any of your doctors about the
11 volume of medications that you are taking?

12 A. If I had, I may, I do not recall.

13 Q. Do you recall that such a discussion
14 took place and just don't recall the details, or
15 you don't know one way or the other?

16 A. I didn't understand your question.

17 Q. Do you recall the topic ever being
18 discussed, with any of your doctors, concerning the
19 volume of medications that you are taking?

20 A. Put it this way. It's always a concern
21 in my mind that the volume of medication I am
22 taking has side effect. If I discussed it with any
23 one of the doctors, I -- I cannot tell you at the
24 moment.

25 Q. In the last five years, have you taken

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2 any medication, other than Tylenol or Advil?

3 A. Yes.

4 Q. What else have you taken?

5 A. I cannot give you the names.

6 Q. Have they been prescription or over the
7 counter?

8 A. Prescriptions.

9 Q. Where do you have your prescriptions
10 filled?

11 A. In New Jersey.

12 Q. Which pharmacy?

13 A. I went to various.

14 Q. What are the pharmacies that you have
15 been to?

16 A. I really -- it was some in New Jersey,
17 some in New York. Whatever was handy in my hand
18 and I saw a pharmacy and I went in there and got
19 the medication if at the time I had insurance, if
20 they accept my insurance. If they didn't accept my
21 insurance, I went to whichever.

22 Q. What insurance are you referring to?

23 A. I think at the time it was 1199.

24 Q. Up until --

25 A. Talking about the last five years,

1 GILADI

2 sorry this is -- it's not --

3 Q. It was 1199 prior to five years?

4 A. That's correct, sorry.

5 Q. Do you recall the name of any pharmacy
6 that you have used in the last five years?

7 A. Really, I don't.

8 Q. Do you use pharmacies around your
9 house?

10 A. I think I use one of them in -- what is
11 it called, Verona.

12 Q. How far is that pharmacy from your
13 house?

14 A. Five-minute drive.

15 Q. Do you recall the name of the pharmacy
16 in Verona?

17 A. I know it starts with a D.

18 Q. Duane Reade?

19 A. No. I know it starts with a D.

20 Q. Sir, have you been seen at the Hospital
21 for Joint Disease in the last five years?

22 A. I believe so.

23 Q. Did you have surgery there?

24 A. No. I had -- I had epidural block.

25 Q. What is your understanding of epidural

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1

2

block?

3

A.

It's not five years -- this was done

4

August '94.

5

Q.

August of '94 or August of '95?

6

A.

August of '94, if I am not mistaken.

7

Q.

What is your understanding of an

8

epidural block?

9

A.

Trying to reduce the pressure of the

10

nerve and the -- the pressure from the nerve by

11

some medication.

12

Q.

Is that an injection?

13

A.

Yes.

14.

Q.

Into your spinal column?

15

A.

To where I do not know. I know there

16

was injection.

17

Q.

What is your recollection of where the

18

injection was?

19

A.

In my lower back.

20

Q.

In the area of the herniated disk?

21

A.

In the neighborhood.

22

Q.

In the what?

23

A.

I did not see --

24

MR. DINHOFFER: He said in the

25

neighborhood.

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2

Q. Did that occur once or more?

3

A. Twice, if I am not mistaken. Sorry --

4

Q. Who was your doctor at that time?

5

A. Sorry, I am confusing a lot of things,

6

as I said everything is -- I cannot recall

7

everything. '94 was Einstein, Joint Disease, I

8

really do not know exactly when it was.

9

Q. Do you know who your doctor was at the

10

time?

11

A. Dr. Goldstein.

12

Q. Were you seen by any other doctors,

13

that you recall at that time?

14

A. As I said, Dr. Goldstein and one of his

15

partners.

16

Q. Do you recall a Dr. David Alpert?

17

A. Maybe that's the one from Joint

18

Disease, but I don't know the name.

19

Q. The name does not mean anything to you?

20

A. No.

21

Q. When you were admitted to the Hospital

22

for Joint Disease, did they take a history from

23

you?

24

A. I do not recall. It was brief, I did

25

not spend much time.

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2 Q. I didn't ask you how much time --

3 A. I do not recall, I do not recall, I do
4 not recall.

5 Q. Did you fill out any forms while you
6 were in Joint Disease?

7 A. I may.

8 Q. Was one of them a consent form?

9 A. It's a possibility.

10 Q. When you read the consent form, did you
11 have any questions for Dr. Goldstein?

12 A. Dr. Goldstein was not there.

13 Q. Who was there?

14 A. Some physicians.

15 Q. Who were the physicians?

16 A. Who performed the epidural block. I do
17 not recall the names.

18 Q. Other than epidural block, have you had
19 any other treatment for your back in the last five
20 years?

21 A. Medication.

22 Q. And that's the Advil and the Tylenol
23 you referred to earlier?

24 A. For some period of time. Also Rx.

25 MR. DINHOFER: Prescription medicine.

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2 Q. Do you recall the names of any of the
3 prescription medicines?

4 A. No.

5 Q. Were you taking Dolobid?

6 A. It's a possibility.

7 Q. Were you taking Flexeril?

8 A. Possibility.

9 Q. Any other possibilities?

10 A. If I knew the name I would let you
11 know, but I do not know.

12 Q. Were you seen by a Dr. Terentiev?

13 A. The name doesn't mean nothing to me.

14 Q. Did you see Dr. Terentiev complaining
15 of a needle stick on the bus?

16 A. This is not from -- this is, this is
17 from New Jersey, yes.

18 Q. So you did see Dr. Terentiev?

19 A. I do not recall the name. As I said,
20 the name means nothing to me because I don't
21 recall, but I do recall that I had a needle stick,
22 that's what got my recollection.

23 Q. Did you tell Dr. Terentiev that you
24 thought the needle contained heroin?

25 A. I didn't tell him, I think the